

Exhibit 1

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**
Case No. 3:20-cv-00019-FDW

WILLIAM F. MACKEY,

Plaintiff,

v.

**DECLARATION OF JONATHAN
ZERULIK**

WELLS FARGO BANK, N.A.,

Defendant.

I, Jonathan Zerulik, declare and state:

1. I am an Enterprise Investigations Senior Investigator-Employment for Wells Fargo Bank, N.A. In this role, I regularly investigate complaints made by Wells Fargo employees alleging violations of the company's policies on discrimination, harassment, and retaliation.

2. I am authorized to make this Declaration on behalf of Wells Fargo Bank, N.A.

3. I have personal knowledge and am competent to testify as to all facts contained in this Declaration. My personal knowledge is based on my review of documents concerning Wells Fargo employees' salary history and promotions maintained in files that are created and kept in the regular course of business on all Wells Fargo employees by Wells Fargo's Human Resources Department.

4. Before William Mackey, Benjamin Hood, Kathie Little, and Jonathan Irwin began working as Securities Operations Service Specialists ("SOSSs") in July 2010, their salaries were: Mr. Mackey: \$32,175.37; Mr. Hood: \$38,466.25; Ms. Little: \$39,799.92; and Mr. Irwin: \$42,537.50.

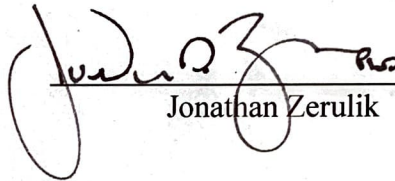
5. Mr. Irwin did not receive a raise when he was transferred to a SOSS 4 position.
6. Mr. Mackey received a raise of \$959.03 when he was promoted to SOSS 3.
7. Mr. Hood received a raise of \$1,532.15 when he was promoted to SOSS 4.
8. Ms. Little received a raise of \$1,570.48 when she was promoted to SOSS 4.
9. Ana Taylor was promoted from SOSS 3 to SOSS 4 on March 9, 2014 by

Operations Manager Laura Richardson.

10. Mr. Hood was promoted from SOSS 4 to Operations Analyst 4 on April 7, 2014.
11. Mr. Irwin was promoted from SOSS 4 to Operations Analyst 4 on April 18, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 4, 2020.


Jonathan Zerulik